

Stephen G. Wilcox
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ATTORNEY FOR AMERICREDIT FINANCIAL SERVICES, INC. D/B/A GM FINANCIAL

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:	§	
	§	
SCANROCK OIL & GAS, INC.,	§	CASE NO. 25-90001-MXM-11
DEBTOR.	§	(Jointly Administered)
	§	
IN RE:	§	
	§	
RYAN C. HOERAUF, INC.,	§	CASE NO. 25-90006-MXM-11
DEBTOR.	§	
	§	Confirmation set:
	§	NOT YET SET

OBJECTION TO CONFIRMATION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW, AmeriCredit Financial Services, Inc. d/b/a GM Financial ("AmeriCredit" or "Creditor"), objecting to the confirmation of the Chapter 11 Plan proposed by Ryan C. Hoerauf, Inc. ("Debtor") and for cause of action would respectfully show the Court as follows:

1. Creditor has a perfected security interest in a 2023 Chevrolet Silverado 1500, Vehicle Identification Number 3GCUDJEL6PG128974. As of the date of filing, Creditor was owed \$38,146.16.
2. Creditor also has a perfected security interest in a 2023 Chevrolet Silverado 3500HD, Vehicle Identification Number 1GC4YSEY6PF136953. As of the date of filing, Creditor was owed \$38,146.16.
3. Debtor's Chapter 11 Plan does not provide treatment as to the vehicles. The plan further does not provide that Creditor shall retain its liens. The Plan must provide for the treatment of Creditor's claims.

WHEREFORE, PREMISES CONSIDERED, Creditor prays for an Order of this Court:

1. Denying confirmation of Debtor's Chapter 11 Plan as proposed; and
2. For such other and further relief, both general and specific, to which Creditor may

show itself justly entitled.

Respectfully submitted,

/s/ Stephen G. Wilcox

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FINANCIAL SERVICES, INC. D/B/A

GM FINANCIAL

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objection to Confirmation was served by FIRST CLASS MAIL, POSTAGE PRE-PAID on:

Ryan C. Hoerauf, Inc.
8180 Lakeview Center, Suite 300
Odessa, TX 79765

and ELECTRONICALLY SERVED on:

Thomas Berghman
Munsch Hardt Kopf & Harr PC
500 N Akard St., Suite 3800
Dallas, TX 75201-6659

Office of the U.S. Trustee
1100 Commerce, Room 976
Dallas, Texas 75242

Dated on June 3, 2025.

/s/ Stephen G. Wilcox

Stephen G. Wilcox

9040-01383-610590